**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**
REGION I
5 POST OFFICE SQUARE, SUITE 100
BOSTON, MASSACHUSETTS 02109-3912

***CERTIFIED MAIL - RETURN RECEIPT REQUESTED***

MAY 2 1 2015

The Metropolitan District Commission
Attn: Andrew Perham, Construction Manager
555 Main Street
P.O. Box 800
Hartford, Connecticut 06142

Re: PCB Cleanup and Disposal Approval under 40 CFR §§ 761.61(a) and (c) and § 761.79(h)
Rocky Hill Water Pollution Control Facility
Rocky Hill, Connecticut

Dear Mr. Perham:

This is in response to the Metropolitan District ("MDC") Notification[1] for approval of a proposed plan to address PCB contamination at the Rocky Hill Water Pollution Control Facility located at 80 Goff Brook Lane in Rocky Hill, Connecticut (the "Site"). Building materials, including caulk and paint and porous substrates, located within areas proposed for upgrades and renovation were identified to contain PCBs at concentrations that exceed the allowable PCB levels under the federal PCB regulations at 40 CFR § 761.20(a), § 761.61, and § 761.62.

Under this Notification, MDC is proposing to address the identified PCB-containing materials and surface covers as follows:

- Remove all caulk and paint with PCB concentrations greater than or equal to ("≥") 50 parts per million ("ppm") and dispose as a *PCB bulk product waste* in accordance with 40 CFR § 761.62

- Remove or decontaminate PCB-contaminated materials in contact with ≥ 50 ppm caulk and/or paint (e.g., windows, painted equipment, appurtenances, piping, and structures) and dispose as *a PCB bulk product waste* in accordance with 40 CFR § 761.62 or encapsulate in accordance with 40 CFR § 761.61(c)

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[1] Information was submitted by AECOM on behalf of MDC to satisfy the requirements under 40 CFR §§ 761.61(a) and (c) and, § 761.79(h). Information was provided dated January 30, 2015(Building Material Remediation Plan); April 3, 2015 (Response to Comments); May 1, 2015 (Modification to Building Material Remediation Plan); and, May 19, 2015 (email Response to Comments). These submittals shall be referred to as the Notification.

- Collect asphalt samples on the east side of the Blower Building in the areas where green-painting piping was identified to determine if PCBs at greater than (">") 1 ppm are present

- Remove PCB-contaminated surface cover materials with > 1 ppm and dispose as a greater than or equal to ("≥") 50 ppm *PCB remediation waste* in accordance with 40 CFR § 761.61(b)

- Encapsulate the Aeration Basins' concrete to a distance of 12 inches from the caulk joints

- Collect surface wipe samples of encapsulated PCB-contaminated *porous surfaces* to confirm that PCB concentrations are less than or equal to ("≤") 1 µg/100 $cm^2$

- Collect verification samples of non-encapsulated *porous surfaces*, soils and asphalt to confirm that PCB concentrations are ≤ 1 ppm

- Temporarily leave in-place the green painted header pipe in the Blower Building pending an evaluation of remedial alternatives

- Record a deed notice in accordance with 40 CFR § 761.61(a)(8) to document remaining PCB concentrations at the Site and to specify use restrictions and long-term monitoring and maintenance requirements for encapsulated PCB-contaminated *porous surfaces*

In the Notification, MDC proposed a deviation from the verification sampling frequency specified under 40 CFR § 761.61(a)(6). Given the data and the proposed removal limits, the alternative sampling frequencies appear reasonable and will be sufficient to confirm that remedial objectives have been achieved. In addition, encapsulation of *porous surfaces* that feasibly cannot be removed, has been determined to be an effective remedial alternative for managing PCB-contaminated materials in-place. EPA has determined that the proposed encapsulation and alternative verification sampling will not pose an unreasonable risk of injury to health or the environment. EPA applies this unreasonable risk standard in accordance with the PCB regulations at 40 CFR § 761.61(c), and the Toxic Substances Control Act, at 15 USC § 2605(e).

MDC may proceed with its cleanup in accordance with 40 CFR §§ 761.61(a) and (c); § 761.62; § 761.79(h); its Notification; and this Approval, subject to the conditions of Attachment 1. Given that the Blower Building header pipe is an integral part of the facility's operations and that the Blower Building is not routinely occupied, EPA has determined that it is reasonable to provide MDC additional time to assess potential remedial alternatives for this piping. However, under this Approval, EPA is requiring that MDC submit a remedial plan and schedule for the painted header pipe in the Blower Building by the end of 2015 (see Condition 1.a.).

This Approval does not release MDC from any applicable requirements of federal, state or local law, including the requirements related to cleanup and disposal of PCBs or other contaminants under the Connecticut Department of Energy and Environmental Protection ("CTDEEP") regulations.

Questions and correspondence regarding this Approval should be directed to:

Kimberly N. Tisa, PCB Coordinator (OSRR07-2)
United States Environmental Protection Agency
5 Post Office Square, Suite 100
Boston, Massachusetts 02109-3912
Telephone: (617) 918-1527
Facsimile: (617) 918-0527

EPA shall not consider this project complete until it has received all submittals required under this Approval. Please be aware that upon EPA receipt and review of the submittals, EPA may request any additional information necessary to establish that the work has been completed in accordance with 40 CFR Part 761, the Notification, and this Approval.

Sincerely,

Nancy Barmakian, Acting Director
Office of Site Remediation & Restoration

Attachment 1: Approval Conditions
Attachment 2: Summary of Building Materials Sample Data and Remediation

cc: Malcolm Beeler, AECOM
Neil Handler, EPA
Gary Trombly, CTDEEP
File

**ATTACHMENT 1:**

**PCB CLEANUP AND DISPOSAL APPROVAL CONDITIONS**
**ROCKY HILL WATER POLLUTION CONTROL FACILITY (the "Site")**
**80 GOFF BROOK LANE**
**ROCKY HILL, CONNECTICUT**

## GENERAL CONDITIONS

1. This Approval is granted under the authority of Section 6(e) of the Toxic Substances Control Act ("TSCA"), 15 U.S.C. § 2605(e), and the PCB regulations at 40 CFR Part 761, and applies solely to the *PCB bulk product waste* and the *PCB remediation waste* identified in the Notification[2] and located at this Site (see Attachment 2).

   a. The Metropolitan District Commission ("MDC") shall submit its schedule and proposed remedial plan to address decontamination of the green painted header pipe located within the Blower Building by December 31, 2015.

   b. In the event that the MDC identifies other PCB-contaminated materials subject to cleanup and disposal under the PCB regulations, the MDC will be required to notify EPA and to clean up the PCB-contaminated soil in accordance with 40 CFR Part 761.

   c. The MDC may submit a separate plan to address the PCB contamination or may propose to modify the Notification to incorporate cleanup of the PCBs under this Approval in accordance with Condition 20.

2. The MDC shall conduct on-site activities in accordance with the conditions of this Approval and with the Notification.

3. In the event that the cleanup plan described in the Notification differs from the conditions specified in this Approval, the conditions of this Approval shall govern.

4. The terms and abbreviations used herein shall have the meanings as defined in 40 CFR § 761.3 unless otherwise defined within this Approval.

5. MDC must comply with all applicable federal, state and local regulations in the storage, handling, and disposal of all PCB wastes, including PCBs, PCB Items and decontamination wastes generated under this Approval. In the event of a new spill during response actions, MDC shall contact EPA within 24 hours for direction on PCB cleanup and sampling requirements.

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[2] Information was submitted by AECOM on behalf of MDC to satisfy the requirements under 40 CFR §§ 761.61(a) and (c) and § 761.79(h). Information was provided dated January 30, 2015 (Building Material Remediation Plan); April 3, 2015 (Response to Comments); May 1, 2015 (Modification to Building Material Remediation Plan); and, May 19, 2015 (email Response to Comments). These submittals shall be referred to as the Notification.

6. MDC is responsible for the actions of all officers, employees, agents, contractors, subcontractors, and others who are involved in activities conducted under this Approval. If at any time MDC has or receives information indicating that MDC or any other person has failed, or may have failed, to comply with any provision of this Approval, it must report the information to EPA in writing within 24 hours of having or receiving the information.

7. This Approval does not constitute a determination by EPA that the transporters or disposal facilities selected by MDC are authorized to conduct the activities set forth in the Notification. MDC is responsible for ensuring that its selected transporters and disposal facilities are authorized to conduct these activities in accordance with all applicable federal, state and local statutes and regulations.

8. This Approval does not: 1) waive or compromise EPA's enforcement and regulatory authority; 2) release MDC from compliance with any applicable requirements of federal, state or local law; or 3) release MDC from liability for, or otherwise resolve, any violations of federal, state or local law.

9. Failure to comply with the Approval conditions specified herein shall constitute a violation of the requirement in 40 CFR § 761.50(a) to store or dispose of PCB waste in accordance with 40 CFR Part 761 Subpart D.

## NOTIFICATION AND CERTIFICATION CONDITIONS

10. This Approval may be revoked if the EPA does not receive written notification from MDC of its acceptance of the conditions of this Approval within 10 business days of receipt.

11. MDC shall submit the following information for EPA review and/or approval:

    a. a certification signed by its selected abatement/remediation contractor, stating that the contractor(s) has read and understands the Notification, and agrees to abide by the conditions specified in this Approval;

    b. a contractor work plan, prepared and submitted by the selected demolition or remediation contractor(s) describing the containment and monitoring that will be employed during abatement activities. This work plan should also include information on waste handling, storage, and disposal and decontamination of field equipment; and,

    c. a certification signed by the selected analytical laboratory, stating that the laboratory has read and understands the extraction and analytical method requirements and quality assurance requirements specified in the Notification and in this Approval.

## REMEDIAL AND DISPOSAL CONDITIONS

12. To the maximum extent practical, engineering controls and removal techniques, such as the use of HEPA ventilated tools, shall be utilized during removal processes to minimize the potential for release of PCBs from the work areas. In addition, to the maximum extent possible, disposable equipment and materials, including PPE, will be used to reduce the amount of decontamination necessary.

13. All visible residues of PCB caulk, PCB paint, and associated materials, equipment, and appurtenances shall be removed and disposed of or decontaminated as described in the Notification. *Porous surfaces* associated with the Aeration Basins shall be encapsulated as described in the Notification. (see Attachment 2 to this Approval).

    a. Verification samples of decontaminated *porous surfaces* (e.g., brick, concrete, and CMU) shall be performed on a bulk basis (i.e., mg/Kg) to confirm PCB concentrations are less than or equal to ("≤") 1 part per million ("ppm"). Samples shall be collected according to the EPA Region 1 *Standard Operating Procedure for Sampling Porous Surfaces for Polychlorinated Biphenyls (PCBs), Rev. 4, May 5, 2011,* to a maximum depth of 0.5 inches.

        i) For decontaminated *porous surfaces* that have PCB concentrations exceeding the decontamination standard, MDC may conduct additional decontamination to achieve the required decontamination standard or must store and dispose of these materials as TSCA-regulated waste in accordance with 40 CFR Part 761.

    b. Verification samples of encapsulated *porous surfaces* shall be conducted to confirm the effectiveness of the encapsulant and the application process. Samples shall be collected on a surface area basis by the standard wipe test as specified in 40 CFR § 761.123 (i.e., µg/100 $cm^2$). Samples shall be collected at the frequency described in the Notification.

        i) In the event that PCB concentrations in any wipe sample is greater than (">") 1 µg/100 $cm^2$, additional coating(s) of encapsulant shall be applied until surface wipe sample results are ≤ 1 µg/100 $cm^2$.

        ii) MDC shall submit a monitoring and maintenance plan ("MMP") to monitor the long-term effectiveness of the encapsulant (see Condition 15).

    c. Chemical extraction for PCBs shall be conducted using Method 3500B/3540C of SW-846; and, chemical analysis for PCBs shall be conducted using Method 8082 of SW-846, unless another extraction or analytical method(s) is validated according to Subpart Q.

14. The cleanup standard for *PCB remediation waste* (i.e., soil and asphalt) shall be ≤ 1 ppm.

    a. Verification samples shall be collected on a bulk basis (i.e., mg/kg) and reported on a dry-weight basis. Verification sampling shall comply with the procedures specified in Subpart O and the frequency described in the Notification (see Attachment 2 to this Approval).

    b. Chemical extraction for PCBs shall be conducted using Method 3500B/3540C of SW-846; and, chemical analysis for PCBs shall be conducted using Method 8082 of SW-846, unless another extraction or analytical method(s) is validated according to Subpart Q.

15. PCB waste (at any concentration) generated as a result of the activities described in the Notification, excluding any decontaminated materials, shall be marked in accordance with CFR 40 CFR § 761.40; stored in a manner consistent with 40 CFR § 761.65; and, disposed of in accordance with 40 CFR § 761.61 or § 761.62, unless otherwise specified below.

    a. Decontamination wastes and residues may be disposed of in accordance with 40 CFR § 761.79(g)(6).

    b. Moveable equipment, tools, and sampling equipment shall be decontaminated in accordance with either 40 CFR § 761.79(b)(3)(i)(A), § 761.79(b)(3)(ii)(A), or § 761.79(c)(2).

    c. PCB-contaminated water generated during decontamination shall be decontaminated in accordance with 40 CFR § 761.79(b)(1) or disposed of under 40 CFR § 761.70.

16. Within 30 days of completion of the work authorized under the Approval, MDC shall submit for EPA's review and approval, a detailed monitoring and maintenance plan ("MMP") for the encapsulated Aeration Basins' *porous surfaces*. MDC shall incorporate any changes to the MMP required by EPA. A copy of the MMP shall be attached to the deed restriction (see Attachment 1, Condition 17).

    a. The MMP shall include: a description of the activities that will be conducted, including inspection criteria, frequency, and routine maintenance activities; sampling protocols and frequency, and analytical criteria; and, reporting requirements, as applicable.

    b. The MMP shall include a communications component which details how the maintenance and monitoring results will be communicated to the Site users, including other on-site workers and other interested stakeholders.

c. The MMP shall include a worker training component for maintenance workers or for any person that will be conducting work that could impact the encapsulated PCB-contaminated *porous surfaces*.

d. MDC shall submit the results of these activities to EPA. Based on its review of the results, EPA may determine that modification to the MMP is necessary in order to monitor and/or evaluate the long-term effectiveness of the barriers.

e. Activities required under the MMP shall be conducted until such time that EPA determines, in writing, that such activities are no longer necessary.

## DEED RESTRICTION AND USE CONDITIONS

17. Within 45 days of completing the activities described in the Notification and authorized in the Approval, MDC shall submit for EPA review and approval, a draft deed restriction for the Site. The deed restriction shall include: a description of the extent and levels of contamination at the Site following abatement; a description of the actions taken at the Site; a description of any use restrictions for the Site; and, the long-term monitoring and maintenance requirements on the Site, which may be addressed in the MMP (see Attachment 1, Condition 16). Within seven (7) days of receipt of EPA's approval of the draft deed restriction, MDC shall record the deed restriction. A copy of this Approval and the MMP shall be attached to the deed restriction.

18. Within ten (10) business days of recording the deed restriction, MDC shall submit to EPA a certification as required under 40 CFR § 761.61(a)(8)(i)(B), that it has recorded the notation on the deed with a copy of the executed deed restriction.

## INSPECTION, MODIFICATION AND REVOCATION CONDITIONS

19. MDC shall allow any authorized representative of the Administrator of the EPA to inspect the Site and to inspect records and take samples as may be necessary to determine compliance with the PCB regulations and this Approval. Any refusal by MDC to allow such an inspection (as authorized by Section 11 of TSCA) shall be grounds for revocation of this Approval.

20. Any proposed modification(s) in the plan, specifications, or information in the Notification must be submitted to EPA no less than 14 calendar days prior to the proposed implementation of the change. Such proposed modifications will be subject to the procedures of 40 CFR § 761.61(a)(3)(ii).

21. Any proposed modification(s) in the plan or specifications contained in the Notification or any departure from the conditions of this Approval without prior, written authorization from the EPA may result in the revocation, suspension and/or modification of the Approval, in addition to any other legal or equitable relief or remedy the EPA may choose to pursue.

22. Approval for these activities may be revoked, modified or otherwise altered: if EPA finds a violation of the conditions of this Approval or of 40 CFR Part 761, including EPA's PCB Spill Cleanup Policy, or other applicable rules and regulations; or, if EPA finds that these activities present an unreasonable risk of injury to health or the environment.

23. Any misrepresentation or omission of any material fact in the Notification or in any records or reports may result in the EPA's revocation, suspension and/or modification of the Approval, in addition to any other legal or equitable relief or remedy the EPA may choose to pursue.

## RECORDKEEPING AND REPORTING CONDITIONS

24. MDC shall prepare and maintain all records and documents required by 40 CFR Part 761, including but not limited to the records required under Subparts J and K. A written record of the cleanup and disposal activities and the analytical sampling shall be established and maintained by MDC in one centralized location. All records shall be made available for inspection by authorized representatives of the EPA, until such time as EPA approves in writing a request for an alternative disposition of such records.

25. MDC shall submit a final report in both hard copy and electronic format (CD-ROM) to the EPA within 60 days of completion of the activities authorized under this Approval. At a minimum, this final report shall include: a short narrative of the project activities with photo-documentation; characterization and confirmation sampling analytical results; copies of the accompanying analytical chains of custody; field and laboratory quality control/quality assurance checks; an estimate of the quantity of PCB waste disposed of and the size of the remediated area(s); copies of manifests and bills of lading or equivalent; and copies of certificates of disposal or similar certifications issued by the disposer.

26. As required under Condition 16 of this Approval, MDC shall submit the results of the long-term monitoring and maintenance activities to EPA as specified in the final MMP to be approved by EPA.

27. As required under Condition 18 of this Approval, MDC shall submit documentation that it has recorded the deed restriction on the Site.

28. Required submittals shall be mailed to:

Kimberly N. Tisa, PCB Coordinator (OSRR07-2)
United States Environmental Protection Agency
5 Post Office Square, Suite 100
Boston, Massachusetts 02109-3912
Telephone: (617) 918-1527
Facsimile: (617) 918-0527

29. No record, report or communication required under this Approval shall qualify as a self-audit or voluntary disclosure under EPA audit, self disclosure or penalty policies.

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**END OF ATTACHMENT 1**

**Table 5**
**Summary of Building Materials Sample Data and Remediation**
**Rocky Hill Water Pollution Control Facility**
**Rocky Hill, Connecticut**

| Sample Identification | Material Description | Total PCBs (mg/kg) | No. of Material Samples | Adjacent Substrate | No. of Substrate Samples | Total PCBs (mg/kg) | Distance from Source | Additional Verification Samples to be Collected | Frequency Verification Sampling | Remediation Notes | Estimated Quantity | Units | Estimated Tonnage (ton) | Regulatory Classification |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| **Administration Building** | | | | | | | | | | | | | | |
| AM-CK-23 | Exterior window caulk applied around the perimeter of all windows | 75,000 | 2 | Brick | 2 | ND - 0.40 | 3" | 5 | 1 60 LF | Remove windows and all exterior and interior caulk (only exterior caulk installed on garage windows) No removal or encapsulation of building substrates interior Removal of 3 inches of brick around the exterior perimeter Dispose all materials as PCB BPW | 420 | LF | 0 1 | PCB BPW |
| AM-CK-28 | | 19,400 | | | | 0 80 | 3" | | | | 350 | | | |
| AM-CK-24 | Interior window caulk applied around the perimeter of all windows except for those in the garage | 49 | 1 | CMU | 2 | 0 55 | 0" | 4 | 1 60 LF | | | | | |
| | | | | | | ND - 0 40 | 0" | | | | | | | |
| AM-CK-25 | Interior door frame caulk applied around the perimeter of all interior doors | 7 2 | 2 | CMU | 1 | ND - 0 40 | 0" | 0 | 1 100 LF | Remove all interior door frame caulk No removal or encapsulation of building substrates Dispose of wastes with PCB BPWs | 100 | | 0 1 | SR |
| AM-CK-29 | | ND - 0 80 | | | | | | | | | | | | |
| **Blower Building** | | | | | | | | | | | | | | |
| BB-CK-26 | Caulk applied around perimeter of concrete pad in contact with floor tile | 44 | 1 | Floor Tile | 2 | 0 5 | 4" | 4 | 1 50 LF | Remove all caulk around electrical control panel and concrete pad, remove entire concrete pad and floor tile and mortar a distance of 6" from the caulk joint and replace materials All materials to be disposed as PCB BPW | 196 | LF | 0 1 | PCB BPW |
| | | | | | | 5 2 | 4" | | | | | | | |
| BB-PT-27 | Yellow paint applied to bollards | 52 | 1 | Asphalt Soil | 0 | - | - | See notes | See notes | Asphalt and soil around bollard to be removed and disposed as PCB Remediation Wasteto and paint exposed, paint will be removed to NACE standard No 2 Following paint remediation, a minimum of 3 samples each (6 total) of soil and asphalt to be collected Dispose paint removal wastes generated as PCB BPW | 12 | SF | 0 1 | PCB BPW |
| RSG-PT-18 | Light green paint applied to air-supply pipe and compressors | 350 | 1 | None | - | - | - | - | - | Painted piping and equipment along with all appurtenances to be removed Header piping to remain in place requires additional planning to determine paint removal method Same piping to be removed from the RAS-WAS Gallery Dispose all materials as PCB BPW Four samples of asphalt outside the building and beneath the painted piping to be collected to characterize potential impacts to asphalt | 276 | LF | 5 | PCB BPW |
| **Aeration Basins** | | | | | | | | | | | | | | |
| AB2-CK-17 | Expansion joint caulk applied to concrete | 1,780 | 1 | Concrete | 2 | ND - 0 50 | 9" | 26 | 1 100 LF | Remove all caulk and encapsulate concrete a distance of 12 inches from the caulk joint Soil remediation also to be performed Waste caulk to be disposed as PCB BPW. Soil remediation in accordance with 61(b) and Subpart O will also be performed | 1,380 | LF | 0 2 | PCB BPW |
| | | | | | | ND - 0 50 | 9" | | | | | | | |
| **RAS-WAS Pump Station** | | | | | | | | | | | | | | |
| RSG-PT-1 | Red Brown paint applied to pipe | 230 | 1 | None | - | - | - | - | - | Painted piping along with all appurtenances to be removed and disposed as PCB BPW | 748 | LF | 27 | PCB BPW |
| RSG-PT-7A | Gray paint applied to pipe | 120 | 1 | None | - | - | - | - | - | Painted piping along with all appurtenances to be removed and disposed as PCB BPW | 230 | LF | 14 | PCB BPW |
| RS3-PT-3 | Green paint applied to pumps | 230 | 1 | None | - | - | - | - | - | Painted piping along with all appurtenances to be removed and disposed as PCB BPW | 8 | EA | 7 5 | PCB BPW |
| RSG-PT-6 | Dark green paint applied to pipe | 180 | 1 | None | - | - | - | - | - | Painted piping and equipment along with all appurtenances to be removed and disposed as PCB BPW. | 138 | LF | 2 1 | PCB BPW |
| RS2-PT-8 | Dark green paint applied to pipe | 230 | 1 | None | - | - | - | - | - | Painted piping and equipment along with all appurtenances to be removed and disposed as PCB BPW | 69 | LF | 1 1 | PCB BPW |
| RS3-PT-2 | White beige paint applied to poured concrete walls in the basement | 39 | 2 | Concrete | 2 | ND - 0 80 | 0" | 0 | 1 1,200 SF | Remove all white beige paint from walls and dispose of paint removal wastes generated with PCB BPWs Concrete beneath is not impacted and does not require encapsulation but will be painted | 2,415 | SF | 3 | SR |
| RS3-PT-14B | | 35 | | | | ND - 0 80 | 0" | | | | | | | |
| RS-CK-4 | Interior window caulk applied around the perimeter of all windows | 74 | 1 | CMU | 0 | - | - | 5 | 1 50 LF | Remove all windows and interior and exterior caulk All materials to be disposed as PCB BPW Verification samples to be collected at the point of contact with the caulk and building substrates Interior and exterior verification samples to be collected at each window | 230 | LF | 0 1 | PCB BPW |
| RS-CK-5 | Exterior window caulk applied around the perimeter of all windows | 11 | 1 | Brick | 0 | - | - | 5 | 1 50 LF | | | | | |
| **Secondary Clarifiers** | | | | | | | | | | | | | | |
| ST1-CK-14 | Expansion joint caulk applied to concrete | 580 | 2 | Concrete | 2 | ND - 0 50 | 6" | 14 | 1 50 LF | Remove caulk and 6" concrete on either side of caulk All materials to be disposed as PCB BPW. Soil remediation in accordance with 61(b) and Subpart O will also be performed. | 690 | LF | 460 | PCB BPW |
| ST2-CK-15 | | 310 | | | | ND - 0 50 | 6" | | | | | | | |
| ST1-PT-16 | Green paint applied to metal structures and equipment | 410 | 2 | Concrete | 2 | ND - 0 50 | Adjacent but no contact | 0 | 0 | Painted structures and equipment to be removed Paint on structures does not contact concrete but concrete tested to determine if there was leaching Wastes generated to be disposed as PCB BPW | 2 | EA | 4 | PCB BPW |
| ST2-PT-51 | | 8 2 | | | | ND - 0 50 | Adjacent but no contact | | | | | | | |



Attachment 2,
Page 1 of 2

**Table 5**
**Summary of Building Materials Sample Data and Remediation**
**Rocky Hill Water Pollution Control Facility**
**Rocky Hill, Connecticut**

| Sample Identification | Material Description | Total PCBs (mg/kg) | No. of Material Samples | Adjacent Substrate | No. of Substrate Samples | Total PCBs (mg/kg) | Distance from Source | Additional Verification Samples to be Collected | Frequency Verification Sampling | Remediation Notes | Estimated Quantity | Units | Estimated Tonnage (ton) | Regulatory Classification |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| **Primary Effluent Pump Station** | | | | | | | | | | | | | | |
| PEPS2-PT-29<br>PEPS-PT-30A | Light green paint applied to concrete walls in the basement | 30<br>45 | 2 | Concrete | 2 | ND 0.80<br>ND 0.80 | 0"<br>0" | 0 | 1 1,500 SF | Remove all light green paint and dispose of paint removal wastes with PCB BPWs. Concrete beneath paint is not impacted with PCBs and does not require encapsulation but will be painted following remediation | 2,990 | SF | 3.7 | SR |
| PEPS2-PT-10<br>PEPS-PT-31 | Cream off-white paint applied to basement ceiling and structural beams | 34<br>37 | 2 | Concrete | 0 | -<br>- | -<br>- | 2 | 1 1,300 SF | Remove all cream off-white paint and dispose of paint removal wastes with PCB BPWs. Sampling to be performed of concrete beneath paint to determine if PCB impacts are present. Data to be submitted to EPA along with recommended actions to address PCB impacts, if any | 2,645 | SF | 3.3 | SR |
| PEPS2-PT-12 | Black paint applied to pipes in basement | 530 | 1 | None | - | - | - | - | - | Painted piping along with all appurtenances to be removed and disposed as PCB BPW | 69 | LF | 0.4 | PCB BPW |
| PEPS-PT-11 | Cream off-white paint applied to main floor metal ceiling | 5,800 | 1 | Metal | - | - | - | - | - | Remove all paint to NACE No. 2 Standard | 3,680 | SF | 4.6 | PCB BPW |
| **Chlorine Building** | | | | | | | | | | | | | | |
| 1-082113 | Green paint applied to monorail beam | 58 | 1 | None | - | - | - | - | - | Remove monorail beam and appurtenances and dispose with PCB BPW | 219 | LF | 5.5 | SR |
| 5-082113 | Beige cream paint applied to electrical conduit | 20 | 1 | None | - | - | - | - | - | Remove all conduit and appurtenances and dispose with PCB BPW | 736 | LF | 0.6 | SR |
| 2-082113 | Caulk around entry door | 2.9 | 1 | Brick | 0 | - | - | 1 | 1.20 LF | Remove caulk around access door and dispose with PCB BPW | 23 | LF | 0.1 | SR |
| 3-082113 | Gray paint applied to scales and scale pads | 263 | 1 | None | - | - | - | - | - | Remove all grey-painted materials, including scale and scale pads and appurtenances and dispose as PCB BPW | 2 | EA | 0.5 | PCB BPW |
| 4-082113 | Yellow painted chlorine pipe | 42 | 1 | None | - | - | - | - | - | Remove all yellow-painted chlorine pipe and appurtenances and dispose as PCB BPW | 115 | LF | 0.8 | PCB BPW |
| 6-060032014 | Light yellow paint applied to pipe | 110 | 1 | None | - | - | - | - | - | Remove all yellow-painted pipe and appurtenances and dispose as PCB BPW | 23 | LF | 0.2 | PCB BPW |
| 7-060032014<br>8-060032014 | Light blue painted applied to pipe wrap | 63<br>72 | 1 | None | - | - | - | - | - | Remove all light blue-painted pipe wrap and dispose as PCB BPW | 173 | LF | 0.1 | PCB BPW |
| 9-060032014<br>10-060032014 | Dark blue paint applied to pipe | 320<br>141 | 1 | None | - | - | - | - | - | Remove all dark blue-painted pipe and dispose with PCB BPW | 58 | LF | 0.1 | PCB BPW |
| 11-060042014<br>12-060042014 | Green paint applied to pump and valve unit | 21<br>22 | 1 | None | - | - | - | - | - | Remove green-painted pump and valve unit and appurtenances and dispose with PCB BPW | 2 | EA | 0.4 | SR |
| **Headworks** | | | | | | | | | | | | | | |
| HD-PT-13 | Exterior Green Paint Horizontal Pipe | 5,700 | 1 | None | 0 | | - | | - | Remove all green-painted pipe and appurtenances and dispose as PCB BPW | 311 | LF | 1.5 | PCB BPW |
| **Sludge Storage Building** | | | | | | | | | | | | | | |
| SH1-PT-19 | Red Brown paint on pipe | 650 | 1 | None | 0 | | - | | - | Remove all red brown-painted pipe and appurtenances and dispose as PCB BPW | 81 | LF | 1.2 | PCB BPW |
| SH1-PT-22 | Light blue paint on pipe | 130 | 1 | None | 0 | | - | | - | Remove all light blue potable water piping and appurtenances and dispose as PCB BPW | 58 | LF | 0.9 | PCB BPW |
| SH2-PT-20 | Blue paint applied to metal tank | 140 | 1 | None | 0 | | - | | - | Remove blue-painted tank and appurtenances and dispose as PCB BPW | 2 | EA | 1.2 | PCB BPW |
| SH2-PT-21 | Red paint on pipe | 79 | 1 | None | 0 | | - | | - | Remove red-painted gas pipe and appurtenances and dispose as PCB BPW | 230 | LF | 1.6 | PCB BPW |

Notes: Additional Verification Samples - Number of verification samples that will be collected following remediation
Frequency Verification Sampling - Number of samples collected during investigation and additional verification sampling. installation of PCB-impacted building material. Units are samples per linear feet (caulk) or samples per square feet (paint)
Estimated tonnage for paint removal includes sandblasting material waste
Appurtenances for pipe and tank removal includes all hangers, braces, and other supports that contact the painted pipe
PCB BPW - PCB BPW
SR - State Regulated



Attachment 2.
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